1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 CHAD EICHENBERGER, individually and on Case No. C14-463 TSZ 9 behalf of all others similarly situated, 10 Plaintiff, COMPLAINT — CLASS ACTION 11 12 v. 13 ESPN, INC., a Delaware corporation, 14 Defendant. 15 16 Plaintiff Chad Eichenberger ("Eichenberger") brings this case individually and on behalf 17 18 of all others similarly situated against Defendant ESPN, Inc. ("ESPN") to put an end to ESPN's 19 wrongful practice of disclosing its users' sensitive information, and to obtain redress for such 20 conduct. Plaintiff alleges as follows upon personal knowledge as to himself and his own acts and 21 experiences and, as to all other matters, upon information and belief, including investigation 22 conducted by his attorneys. 23 NATURE OF THE ACTION 24 1. ESPN is one of the largest producers of sports-related news and entertainment 25 programming in the world. Perhaps best known for its eponymously named television channel, 26 ESPN also offers content to consumers via other media including its proprietary software 27 LAW OFFICES OF